

**Comment submitted in response to Section 63.71 Application by Touch America, Inc. to
Discontinue Domestic Telecommunications Services**

WC Docket No. 03-259

1. The Touch America Section 63.71 Application requests FCC authorization to terminate frame relay and ATM services as of 31 January 2004.
2. Northrop Grumman, under a prime contract with the US Department of the Treasury, is authorized to provision and manage data telecommunications services for the Bureau of Alcohol, Tobacco, and Firearms (ATF), the Internal Revenue Service (IRS), the National Integrated Ballistics Information Network (NIBIN), and the U.S. Secret Service (USSS). These services for the U.S. Government are critical and must not be interrupted.
3. Within the 14-state Region where Qwest is the Local Exchange Carrier, Northrop Grumman procures ATM/Frame Relay services from Touch America (TA). Outside of the 14-state Region, Northrop Grumman procures ATM/Frame Relay services from Qwest Communications Corporation (QCC). Internetworking interfaces between the TA and Qwest networks provide data paths between the two networks.
4. Northrop Grumman has received formal notice of Touch America's intention to discontinue frame relay and ATM services, and is aggressively pursuing transfer of these critical services to QCC. These provisioning actions are proceeding quickly, but there is no guarantee that all Touch America services will be fully replaced before 31 January 2004. This is due to the scope of the services involved, the complexity of the ATM/FR network topology, and the lead time required to replace broadband DS3, and OC3 circuits in an orderly fashion.
5. In Section II of the application, Touch America commits to ensuring that there will be no interruption or discontinuance in services.
6. In Section II, Paragraph B, Touch America specifically acknowledges the criticality of the frame relay and ATM services provided to Northrop Grumman, and commits, to "...provide a coordinated effort to provide the continuity of service sought by NG...."
7. Northrop Grumman has encouraged Touch America, Qwest and 360Networks to extend their coordinated efforts to include the contingency where some services might not be fully transferred to Qwest as of 31 January 2004. This effort has been unsuccessful, and it is now our understanding that TA will not consider such a contingency.
8. Therefore, Northrop Grumman, to ensure continuity of ATM/FR services to critical ATF, IRS and USSS sites, must object to Touch America's request that the Section 63.71 application be effective as of 31 January 2004. Northrop Grumman requests that the FCC not authorize the unilateral discontinuance of any services to Northrop Grumman earlier than 28 February 2004.

Respectfully Submitted
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